

Incidental Emitters Proposal

NR 445 Technical Advisory Group
December 3, 2001

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Goal & Objectives for Screening Process

- ◆ Simple and straightforward screen for facilities that do not emit HAPs or emit HAPs below a level of concern
 - ◆ Regulatory ease of compliance for these facilities
 - ◆ Targets resources on more environmentally significant HAP sources
- ◆ Regulatory safeguards for public health
 - ◆ Authority to require compliance with NR 445 standards if found that the standards are exceeded
 - ◆ Safe harbor language so that sources are not penalized retroactively if they have followed the process



Screening Criteria

- ◆ Screen 1: Business sectors unlikely to emit HAPs (SIC codes)
- ◆ Screen 2: Other business sectors: Less than 1 ton of total VOCs or PM emissions
- ◆ Screen 3: All business sectors: Do not meet any of three factors of concern:
 - ◆ engaged in production or combustion processes known to emit highly toxic chemicals
 - ◆ use or create highly toxic chemicals
 - ◆ located in an area where potential population exposure is high



Screen I: Business Sector Screen (unlikely to emit HAPs)

- ◆ SIC 01-09: Agriculture, Forestry and Fishing
- ◆ SIC 15: General Building Contractors
- ◆ SIC 17: Special Trade Contractors
- ◆ SIC 40-45, 47: Transportation
- ◆ SIC 48: Communications
- ◆ SIC 50-51: Wholesale Trade, except chemicals and allied products; petroleum and petroleum products
- ◆ SIC 52-59: Retail Trade
- ◆ SIC 60-69: Finance, Insurance and Real Estate
- ◆ SIC 70-89: Services, except for Laundry, cleaning and garment services; Business Services, nec; Automotive Repair Shops; Miscellaneous Repair Shops; Research and Testing Services



Screen 2: Other Business Sectors Less than 1 ton of total VOC or PM emissions

- ◆ SIC 10-14: Mining
- ◆ SIC 16: Heavy construction
- ◆ SIC 20-39: Manufacturing
- ◆ SIC 46: Transportation, Pipelines
- ◆ SIC 49: Electric, gas and sanitary services
- ◆ SIC 516 and 517: Wholesale Trade: Chemicals and allied products; petroleum and petroleum products
- ◆ SIC 721, 7389, 753, 769, 873: Services: Laundry, cleaning and garment services; Business services, nec; Automotive Repair Shops; Miscellaneous Repair Shops; Research and Testing Services
- ◆ SIC 91-97: Public Administration



Screen 3: All Business Sectors Processes of concern

- ◆ Processes of concern:
 - ◆ power generation
 - ◆ expected sources of dioxins & PCBs
 - ◆ solid, hazardous and medical waste incineration
 - ◆ sludge incineration
 - ◆ chrome electroplating
 - ◆ ethylene oxide sterilizers
 - ◆ printing operations using more than 'x' gallons of ink/month
 - ◆ coating operations using more than 'x' gallons/month



Screen 3: All Business Sectors Chemicals of concern

- ◆ List of chemicals of concerns
 - ◆ see hand-out
 - ◆ excludes chemicals expected to be emitted from processes of concern
- ◆ Ad Hoc Group:
 - ◆ Henry Anderson and Lynda Knobeloch (DHFS)
 - ◆ John Hausbeck (Madison Health Department)
 - ◆ Rudy Salcedo (Milwaukee Health Department)
 - ◆ Marty Kanarek UW-Madison, Dept of Preventive Medicine



Screen 3: All Business Sectors Chemicals of concern

- ◆ Initial list of 92 chemicals
- ◆ Shorter list (of 31) developed using the following criteria:
 - ◆ The total number of votes a chemical received from members
 - ◆ Toxicity, both acute and chronic, especially for chemicals which are not VOCs or PM
 - ◆ Addressed by other regulations? (e.g., lead)
 - ◆ Likelihood of being emitted in WI, using AEMS
 - ◆ Likelihood of smaller sources emitting chemical in amounts that could be of concern



Screen 3: All Business Sectors That are Considered to Otherwise be Small Emitters Locations of concern (Revised Concept January 2002)

- ◆ **Emission source is less than 100 feet from a property line of a residence, school, day care center, or health care facility.**
- ◆ **These sources would need to evaluate emissions of the larger list (additional 47) of chemicals (see list - this is from larger list of chemicals identified initially by the small emitters chemicals of concern workgroup)**

